

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

ART VAN FURNITURE, LLC, *et. al.*,<sup>1</sup>

Debtors.

Chapter 7

Case No. 20-10553 (CSS)

(Jointly Administered)

ALFRED T. GUILIANO, in his capacity as  
Chapter 7 Trustee of Art Van Furniture,  
LLC, *et. al.*,

Plaintiff,

v.

UNITED FURNITURE INDUSTRIES,  
INC.; FIRST-CITIZENS BANK & TRUST  
COMPANY d/b/a THE CIT GROUP,

Defendants.

Adv. Proc. No. 22-50227 (CSS)

**STIPULATION EXTENDING TIME TO ANSWER, MOVE OR OTHERWISE  
RESPOND TO THE COMPLAINT**

Alfred T. Guiliano, in his capacity as Chapter 7 Trustee of Art Van Furniture, LLC (“Plaintiff”), and United Furniture Industries, Inc. (“United Furniture” or Defendant,” and together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of. Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

WHEREAS, on March 3, 2022, Plaintiff filed a *Complaint* (D.I. 1394; A.D.I. 1) (the “Complaint”) against United Furniture initiating the above-captioned adversary proceeding; and

WHEREAS, on March 4, 2022, Plaintiff filed and issued the summons (A.D.I. 2), which reflects that the summons and Complaint were served on United Furniture by first class and certified mail; and

WHEREAS, United Furniture’s deadline to answer, move, or otherwise respond to the Complaint is April 4, 2022; and

WHEREAS, counsel for the Parties have agreed to extend the time for United Furniture to answer, move, or otherwise respond to the Complaint through and including May 4, 2022.

NOW THEREFORE, in consideration of the premises and mutual covenants contained herein and other valuable consideration, the receipt of which is hereby acknowledged, it is stipulated and agreed by and between the Parties, as follows:

1. United Furniture’s time to answer, move, or otherwise respond to the Complaint is extended through and including May 4, 2022.
2. This extension is without prejudice to United Furniture’s right to seek further extensions of time from the Court to answer, move, or otherwise respond to the Complaint and Plaintiff’s rights to oppose any such request.

*[Signature page follows]*

Dated: March 29, 2022

**PACHULSKI STANG ZIEHL & JONES  
LLP**

/s/ Peter J. Keane

Bradford J. Sandler, Esq. (DE Bar No. 4142)  
Andrew W. Caine, Esq. (CA Bar No. 110345)  
Peter J. Keane, Esq. (DE Bar No. 5503)  
Jeffrey P. Nolan, Esq. (CA Bar No. 158923)  
919 North Market Street, 17<sup>th</sup> Floor  
P. O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: bsandler@pszjlaw.com  
acaine@pszjlaw.com  
pkeane@pszjlaw.com  
jnolan@pszjlaw.com

*Counsel to Plaintiff, Alfred T. Giuliano, Chapter  
7 Trustee for the Estates of Art Van Furniture,  
LLC, et al.*

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Jonathan M. Weyand

Donna L. Culver (No. 2983)  
Curtis S. Miller (No. 4583)  
Jonathan M. Weyand (No. 6959)  
1201 North Market Street, 16th Floor  
P.O. Box 1347  
Wilmington, Delaware 19899-1347  
Telephone: (302) 658-9200  
Email: dculver@morrisnichols.com  
cmiller@morrisnichols.com  
jweyand@morrisnichols.com

*Attorneys for Defendant  
United Furniture Industries, Inc.*